

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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HEATHER NELSON,

Plaintiff,

v.

Case No.: 11-cv-307

SANTANDER CONSUMER USA, INC.,  
PATRICK K. WILLIS CO., INC.,  
d/b/a AMERICAN RECOVERY SERVICE,  
ASSETSBIZ CORP. d/b/a ABC RECOVERY,

Honorable Barbara B. Crabb

Defendants.

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**DEFENDANT SANTANDER CONSUMER USA, INC.'S PARTIAL MOTION  
FOR SUMMARY JUDGMENT PURSUANT TO FED. R. CIV. P. 56**

For the reasons set out in the accompanying Memorandum of Law in Support of Defendant Santander Consumer USA, Inc.'s Partial Motion for Summary Judgment, Defendant Santander Consumer USA, Inc. ("Santander") hereby moves for partial summary judgment pursuant to Fed. R. Civ. P. 56, and requests that this Court enter an order granting judgment in Santander's favor as a matter of law with respect to the First Claim for Relief set out in Plaintiff's Second Amended Complaint.

Dated: January 7, 2013

Santander Consumer USA, Inc.

s/ David Z. Smith

David. Z. Smith

Gary S. Caplan

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**CERTIFICATE OF SERVICE**

I, David Z. Smith, hereby state that on January 7, 2013, I electronically filed *Defendant Santander Consumer USA, Inc.'s Partial Motion for Summary Judgment* with the Clerk of the Court using the ECF system, which will send notification to all parties of record.

By: /s/ David Z. Smith

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